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February 7, 2022

Hon. Gary R. Brown
United States District Judge
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: United States v. Ruendy Hernandez-Vasquez
Cr. Docket No. 16-403 (GRB)

Dear Judge Brown:

Along with Todd Bussert, I represent Mr. Hernandez-Vasquez, who is a member of Trial Group 4, in the above-referenced matter. I write to request an adjournment of the status conference scheduled for Friday, February 11, 2022.

The parties have reached a disposition in principle but it has not yet been reduced to a writing. The parties expect that a written version of the plea agreement will be completed in the next two weeks and I will then schedule a meeting with the defendant to review it. Because there is nothing else to mention at a status conference and, in light of the risks associated with in-court proceedings during the present Covid-19 pandemic, I request that the February 11 status conference be adjourned and rescheduled for a date in mid-March, at which time it is expected that the conference will be converted to a change-of-plea proceeding. Owing to the ongoing nature of the plea negotiations, Mr. Hernandez-Vasquez consents to the exclusion of time under the Speedy Trial Act until the next conference date. I make this application with the government's consent.

Respectfully submitted,


James M. Branden